GRIDWISE ALLIANCE
2003–2023

To: Federal Communications Commission
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From: The GridWise Alliance
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Date: 9/05/2024

Re: Public Notice Regarding NextNav Petition for Rulemaking (Docket No. 24-240 RM-11989)

The GridWise Alliance is writing to express our concerns surrounding the proposed reconfiguration of the 902-928 MHz band for the development of NextNav's terrestrial PNT services and 5G mobile broadband as outlined in the Petition for Rulemaking (Docket No. 24-240 RM-11989).

We are an industry association of electricity industry stakeholders focused on accelerating innovation that delivers a more secure, reliable, resilient, and affordable grid to support decarbonization of the U.S. economy. Our membership is comprised of leading electric utility companies and the manufacturers and developers of the technologies enabling the transition to a modernized grid.

As electricity demand grows and utilities continue to expand upon the over 120 million[1] industrial IoT Devices that are currently deployed throughout electricity transmission and distribution systems, mesh communications networks are becoming increasingly integral to the stability of the critical infrastructure that hundreds of millions of end users rely on every day. Critical grid technologies that rely on mesh communication networks include Advanced Metering Infrastructure (AMI), Fault Location, Isolation and Service Restoration (FLISR), Distributed Energy Resource Management Systems (DERMS), Dynamic Line Rating (DLR), Advanced Distribution Management Systems (ADMS), Advanced Power Flow Control (APFC), and more.

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[1] Navigant Research, AMI Gold Standards Report: An Assessment of the Smart Electric Metering Landscape. 2019.

Current regulations protecting ease of access to the shared 902-928 MHz make it possible for frequency hopping devices to utilize the full band and minizine self-interference due to collisions. The privatization of the 900Mhz band would reduce the operating bandwidth available to utility operations, thus jeopardizing system reliability, latency, and throughput, and weaking the ability of grid operators to use this network of interconnected smart devices to effectively orchestrate power supply.

Aside from the potential immediate impacts to grid operations resulting from the elimination of the shared band, such a change would also force the recall of many of these essential smart devices and require the restructuring of existing networks. Taken together, these setbacks could significantly disrupt the pace at which power utilities are able to scale the innovative grid technologies and capabilities essential to the continued energy transition. For the scale of the impact this petition could have, the Energy Information Agency reports that 72% of electric meters for residential and commercial customers, or almost 119 million,[2] are smart meters, many of which operate in the frequency at question in this petition.

Given the value that the continued ease of access to the 902-928MHz provides for the operation of essential grid services and the detrimental impacts that such a reconfiguration would have for the electricity industry and other public services, the GridWise Alliance strongly recommends that the Commission dismiss the petitioner's request for rulemaking to prevent impacts to existing public service operations and the continued deployment of smart technologies essential to the modern grid.

Respectfully,

Karen Wayland
CEO, The GridWise Alliance
View Membership List

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[2] Frequently Asked Questions (FAQs) - U.S. Energy Information Administration (EIA)